

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Sept 28, 2023

UNITED STATES OF AMERICA

v.

EZILLE TYUS

Case No.

23-cr-514

Judge Wood

Magistrate Judge Weisman

Random/CAT 3

Violations: Title 18, United States Code,
Sections 922(g)(1), 924(c); Title 21,
United States Code, Section 841(a)(1)

COUNT ONE

The SPECIAL JANUARY 2023 GRAND JURY charges:

On or about January 30, 2023, at Chicago, in the Northern District of Illinois,
Eastern Division,

EZILLE TYUS,

defendant herein, knowing that he had previously been convicted of a crime
punishable by a term of imprisonment exceeding one year, did knowingly possess, in
and affecting interstate commerce, a firearm, namely, a loaded 9mm Taurus G2C
semi-automatic pistol, bearing serial number ABK066466, which firearm had
traveled in interstate commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

FILED

SEP 28 2023 Jc

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

COUNT TWO

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about January 30, 2023, at Chicago, in the Northern District of Illinois,
Eastern Division,

EZILLE TYUS,

defendant herein, did knowingly and intentionally possess with intent to distribute a
controlled substance, namely, a quantity of a mixture and substance containing a
detectable amount of marijuana, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a).

COUNT THREE

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about January 30, 2023, at Chicago, in the Northern District of Illinois,
Eastern Division,

EZILLE TYUS,

did knowingly possess a firearm, namely, a loaded 9mm Taurus G2C semi-automatic pistol, bearing serial number ABK066466, in furtherance of a drug trafficking crime for which defendant may be prosecuted in a court of the United States, namely, possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a), as charged in Count Two of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

FORFEITURE ALLEGATION

The SPECIAL JANUARY 2023 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 922(g), as set forth in this Indictment, defendant shall forfeit to the United States of America any firearms and ammunition involved in and used in the offense, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to, a loaded 9mm Taurus G2C semi-automatic pistol, bearing serial number ABK066466 and associated ammunition.

A TRUE BILL:

FOREPERSON

signed by Scott Edenfield on behalf of the
UNITED STATES ATTORNEY